

Weiland Golden Goodrich LLP  
660 Town Center Drive, Suite 600  
Costa Mesa, California 92626  
Tel 714-966-1000 Fax 714-966-1002

1 **WEILAND GOLDEN GOODRICH LLP**  
Jeffrey I. Golden, State Bar No. 133040  
2 jgolden@wglp.com  
Ryan W. Beall, State Bar No. 313774  
3 rbeall@wglp.com  
650 Town Center Drive, Suite 600  
4 Costa Mesa, California 92626  
Telephone 714-966-1000  
5 Facsimile 714-966-1002  
  
6 Attorneys for Debtor  
SOUTHERN INYO HEALTHCARE DISTRICT  
7

8 **UNITED STATES BANKRUPTCY COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**  
10 **SACRAMENTO DIVISION**

11 In re  
12 SOUTHERN INYO HEALTHCARE  
DISTRICT,  
13  
14 Debtor.

Case No. 1:16-bk-10015-FEC  
Chapter 9  
WGG-2

**STIPULATION TO RESOLVE DEBTOR'S  
OBJECTION TO PROOF OF CLAIM 48-1  
FILED BY TULARE LOCAL HEALTHCARE  
DISTRICT**

Date: December 17, 2019  
Time: 9:00 a.m.  
Place: 501 I. Street  
Sacramento, CA  
Courtroom 28

21 **TO THE HONORABLE FREDERICK E. CLEMENT, UNITED STATES BANKRUPTCY**  
22 **JUDGE AND ALL PARTIES IN INTEREST:**

23 Southern Inyo Healthcare District ("Debtor"), by and through its undersigned  
24 counsel, and Tulare Local Healthcare District ("Tulare," and together with Debtor, the  
25 "Parties"), enter into this Stipulation to Resolve Debtor's Objection to Proof of Claim 48-1  
26 Filed by Tulare Local Healthcare District ("Stipulation") as follows:  
27  
28

## RECITALS

1. On July 8, 2019, Debtor filed Objection ("Objection") to Proof of Claim Number 48-1 ("Claim") filed by Tulare Local Healthcare District setting the hearing on the Objection ("Hearing") for August 28, 2019 [Dkt. 619].

2. On August 15, 2019, the Parties filed a Stipulation to Continue the Hearing on Debtor's Objection to Proof of Claim 48-1 filed by Tulare Local Healthcare District to October 22, 2019 [Dkt. 641]. The Court granted this stipulation pursuant to order entered August 22, 2019 [Dkt. 644].

3. On October 9, 2019 [Dkt. 696], the Parties filed a stipulation to continue the Hearing on the Objection to a mutually agreed upon date of December 17, 2019, at 9:00 a.m.

4. On October 24, 2019 [Dkt. 719], the Parties filed a stipulation to advance the Hearing on the Objection to a mutually agreed upon date of November 19, 2019, at 9:00 a.m. The Court granted this stipulation pursuant to order entered October 27, 2019 [Dkt. 724].

5. The Parties further continued the Hearing on the Objection to December 17, 2019, at 9:00 a.m. to coincide with Tulare's Motion to Estimate Claim ("Estimation Motion") set for the same date and time.

6. The Parties have now reached a resolution of their disputes.

## STIPULATION

NOW THEREFORE, based upon the foregoing recitals, and subject to Court approval, the Parties hereby stipulate and agree as follows:

a. The Claim will be allowed as a general unsecured claim, with no post-petition priority or administrative status, in the amount of \$996,519.19;

b. The Objection shall be withdrawn and the Hearing taken off calendar;

c. The Estimation Motion shall be withdrawn and the hearing taken off calendar; and

d. In the event that the above-captioned bankruptcy case is dismissed, the provisions set forth in Paragraph (a) above shall be void and the Parties will revert to their same rights, defenses, and arguments as existed prior to the time of this Stipulation.

IT IS SO STIPULATED.

Dated: November , 2019

WEILAND GOLDEN GOODRICH LLP

By:



Jeffrey I. Golden  
Attorneys for Debtor  
Southern Inyo Healthcare District

Dated: November 24 2019

By:



Sandra Ormonde  
Chief Executive Officer  
for Tulare Local Healthcare District

Weiland Golden Goodrich LLP  
1400 W. Center Blvd., Suite 200  
P.O. Box 1000, Inyo County, CA 93540  
Tel 760-388-1800 Fax 760-388-1002